

YOUR ROLE

Never assume that someone else at Stiefel already knows about an issue, is acting to resolve an issue, or does not care about an issue. It is up to each employee to take responsibility and address concerns.

SPEAK UP!

If you see or suspect unethical, illegal, or unsafe activity, speak up. In doing so, you could keep a potentially serious situation from becoming worse.

There are multiple ways to report an incident:

- Talk to your supervisor. He or she should be your first point of contact.
- Call your Human Resources department, the Legal department, or the Office of Ethics and Compliance (contacts listed below).
- If you prefer to remain anonymous; Call 1-888-280-1847. This is a toll-free Hotline available to you 24 hours a day, 7 days a week.

24-HOUR INTEGRITY HELPLINE

1-888-280-1847

Call our Helpline toll-free,
24 hours a day, 7 days a week.

24-HOUR HOTLINE

1. When you call, a professional interviewer will give you the option to remain anonymous and will document your concern in detail.
2. The information you provide will be reviewed for appropriate follow-up.
3. You may call back to provide additional information or to answer questions that arise as your concern is investigated.

Unethical, illegal, or unsafe activity
is harmful to the future of our
company. With your help, we
can prevent non compliance and
uphold our high standards of
honesty, fairness, and integrity.



STIEFEL, A GSK COMPANY

SPEAK UP

HONESTY · FAIRNESS · INTEGRITY

AN ETHICAL WORKPLACE BEGINS WITH YOU

Stiefel has a special distinction in the pharmaceutical industry of serving generations of patients for over 160 years. Patients use our products because they trust the Stiefel name and our company. Maintaining this distinction requires everyone's commitment to our core values and ethical standards. That means making integrity a priority in everything we do.

WHY SHOULD YOU GET INVOLVED?

Unethical, illegal, or unsafe activity can result in serious consequences to those who use our products. For Stiefel, this could result in fines or lawsuits that could hurt our performance and our reputation.

We rely on each other to uphold our strong reputation and history. All of us have an obligation to report suspected harmful activity. Together, we can uphold Stiefel's core values.

RECOGNIZE HARMFUL ACTIVITY

Some common examples of harmful activity include:

- Conflicts of interest
- Auditing or accounting irregularities
- Theft and fraud
- Misuse of proprietary information
- Misuse of assets
- Insider trading
- Equal Opportunity violations
- Improper dealings with customers or vendors
- Creating or ignoring safety hazards
- Use or sale of illegal drugs

ACT WITH INTEGRITY

Asking yourself these questions can help determine if a course of action is ethical:

- Am I being fair and honest?
- Am I acting in accordance with the Stiefel values? The Peak Performance Behaviors?
- Would failing to act make the situation worse or allow an injustice to continue?
- How would my actions look if they were reported on the front page of a newspaper?
- If I were testifying in court and asked to explain what I had done, how would I respond?



STIEFEL'S OPEN DOOR POLICY

Don't be afraid to voice your concerns. Your questions and suggestions regarding ethical business conduct are always welcome. Stiefel management is dedicated to listening and responding to your concerns.

CONTACTS

For questions, contact your local
Human Resources representative or call:

Legal
+1-786-999-7044

Office of Global Ethics and Compliance
Global: +1-678-889-4040
Americas: +1-678-714-4171
Eurasia: +1-678-714-4165

